

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Case No: CR-21-139-SLP</b>
	)	
<b>VALENA ACOSTA-GWYNN</b>	)	
	)	
<b>Defendant.</b>	)	
	)	
	)	

**MOTION FOR ENLARGEMENT OF TIME IN WHICH TO FILE  
PSR OBJECTIONS**

COMES NOW, the Defendant, Valena Acosta-Gwynn, through her attorney of record, John Jensen, and moves the Court for an Order granting an enlargement of time in which to file the PSR objections. In support of said motion counsel shows the Court the following:

1. That the Presentence Investigation report was filed on March 25, 2022 and objections are due on April 8, 2022.
2. That counsel had a heart attack on December 27, 2021 and has had continuing medical complications since that date.

3. That on January 9, 2022 counsel had severe complications and was placed back in the hospital where he had pacemaker and cardiac defibrillator implants.
4. That on March 20, 2022 counsel had an atrial fibrillation which caused his cardiac defibrillator to activate.
5. That counsel was placed back in the hospital for 8 days for observation and medical attention due to the atrial fibrillation.
6. That since his release from the hospital counsel has been physically incapacitated and his ability conduct daily tasks has been restricted.
7. That as a result, defense counsel requests further time to review the PSR contents with the Defendant and prepare any potential objections.
8. That the counsel respectfully requests an additional 10 days in which to file his written objections to the Presentence Investigation Report.
9. That counsel has notified the United States Probation Officer Whitney Chakroun regarding the requested time extension and she has no objection.

10. That counsel has notified Danielle Connolly, Assistant United States Attorney, regarding the requested time extension and she has no objection.

WHEREFORE, Defendant requests until April 18, 2022 in which to file any objections she may have to the Presentence Investigation Report.

Respectfully Submitted,

S/ John Jensen

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ATTORNEY FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

This is to certify that on this 8<sup>th</sup> day of April 2022, the foregoing document was electronically transmitted to the Clerk of the Court using the ECF System for filing and transmittal to all known ECF registrants.

S/ John Jensen

John Jensen